



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

174575  
0000004

REPLY TO THE ATTENTION OF

**MEMORANDUM**

SE-5J

DATE: SEP 10 2002

SUBJECT: **ENFORCEMENT ACTION MEMORANDUM** - Determination of Threat to Public Health and the Environment at the LaSalle Rolling Mill Site, LaSalle, LaSalle County, Illinois (Site ID #B5T6)

FROM: Brad Benning, On-Scene Coordinator  
Emergency Response Section II

TO: William E. Muno, Director  
Superfund Division

THRU: Richard Karl, Chief *R. Karl*  
Emergency Response Branch

**I. PURPOSE**

The purpose of this memorandum is to document the determination of an imminent and substantial threat to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances located at the LaSalle Rolling Mill Site at 1375 Ninth Street in LaSalle, LaSalle County, Illinois (the 'Site'). The hazardous substances consist of chemicals associated with the Site's copper plating operation: potassium cyanide solutions, acids, oxidizers, spent plating solutions (F007), and flammable liquids. Numerous reagent bottles are located within an on-site laboratory, as well as a variety of waste oils located in tanks and drums.

The proposed response action will mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site. Proposed removal actions include, but are not limited to, the assessment and stabilization of chemical hazards at the Site, and the transportation and off-site disposal of the hazardous substances. The presence of hazardous substances located at the Site, the potential for migration off-site, the unrestricted access to the property, and the Site's proximity to residential and commercial areas require that this removal be classified as time-critical.

The Site is not on the National Priorities List ('NPL').

## **II. SITE CONDITIONS AND BACKGROUND**

The CERCLIS ID number for the Site is ILN000508129.

### **Site Description**

#### **1. Removal site evaluation**

U.S. EPA conducted an inspection at the closed LaSalle Rolling Mill facility on August 22, 2000. The purpose of the inspection was to accompany officials from the U.S. Mint and Federal Bureau of Investigation (FBI), which were investigating the status of raw materials (copper and zinc) owned by the U.S. Government that may have been abandoned due to the Chapter 7 Bankruptcy. U.S. EPA had been requested to join the inspection to assess any environmental concerns as a copper cyanide plating process had been used at the facility. The facility was preparing for a liquidation sale at the time of the inspection and a general walk-through of the facility identified the following areas of concern: 1) Copper plating line consisting of more than 20 vats which utilized potassium cyanide and acid rinses; 2) Wastewater treatment area consisting of numerous tanks and filter presses, including one tank that was observed to contain 900 gallons of spent cyanide solution; 3) Drum storage area with 64 containers of F006/F008 waste; 4) Unused product remaining on site including 15 containers of potassium cyanide solids and solutions, 21 containers of acids, 12 containers of oxidizers, 4 containers of flammable liquids, and 16 containers of used oil; 5) Numerous small containers which apparently were consolidated from throughout the facility; 6) Laboratory which contained hundreds of small reagent bottles of chemicals; 7) Several outside storage

tanks with at least 6 containing mill oil, and 1 containing approximately 15,000 gallons of weak cyanide solution;  
8) Insulation, which appeared to be asbestos was observed on piping and an old steam engine.

## **2. Physical location**

The property is located at 1375 9<sup>th</sup> Street in LaSalle, LaSalle County, Illinois. Coordinates for the site are latitude 41 degrees 20' 16" North and longitude 89 degrees 05' 18" West. It is located in an industrial/residential neighborhood, with approximately 895 residents living within one half mile of the site. The Vermilion River is approximately 1000 feet east of the site.

U.S. EPA prepared a Region 5 Superfund Environmental Justice (EJ) analysis for the area surrounding the Site. This analysis is presented in Attachment III. In Illinois, the low-income percentage is 27 and the minority percentage is 25. To meet the EJ concern criteria, the area within 1 mile of the Site must have a population that is twice the state low-income percentage and/or twice the state minority percentage. That is, the area must be at least 54% low-income and/or 50% minority. At this site, the low-income percentage is 59.7% and the minority percentage is 6.37% as determined by Arcview or Landview III EJ analysis. Therefore, this site does meet the region's EJ criteria based on demographics as identified in Region 5 Interim Guidelines for Identifying and Addressing a Potential EJ Case, June 1998.

## **3. Site characteristics**

The property known as LaSalle Rolling Mill operated as a metal forming and rolling facility. The facility had been under contract to the U. S. Mint to generate metal blanks for pennies, which required copper plating onto zinc blanks. The facility occupied approximately 12 acres with one main building which contained two furnaces, rolling mill, copper plating line and associated treatment operation, laboratory, warehouse area, and offices. Several storage tanks are located outside which are used for the storage of mill oil and spent plating solution. Although the tanks appeared to have secondary containment, oil staining was present in numerous locations on the west side of the facility. A past spill of mill oil had occurred at the facility and the contaminated soils generated from the

remediation were still stored on site. The site is fenced and randomly inspected by the owner.

**4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant**

Investigations at the site have determined that releases have impacted soils, and that potential future releases are likely due to the nature of hazardous substances in the facility and the deteriorated condition of the site.

**B. Other Actions to Date**

**1. Previous actions**

U.S. EPA has been working with the owner and his consultant to address the problems remaining at the site since the bankruptcy and liquidation of assets. The owner has removed the drums containing the F006/F008 waste, and is in the process of removing the plating line. The owner is attempting to reopen the mill for limited use and would like to lease out the east portion of the building for warehouse storage. Due to the nature of the hazardous substances still remaining on site the U. S. EPA would prefer to monitor the cleanup activities pursuant to an Administrative Order of Consent (AOC).

**2. Current actions**

U.S. EPA is currently drafting an AOC for the site, and will be negotiating the scope of work with the potentially responsible parties (PRPs).

**C. State and Local Authorities' Roles**

**1. State and local actions to date**

The Illinois EPA has been inspecting the facility due to its regulatory status as a RCRA Generator. After the facility closed the Illinois EPA required the site to go through closure as waste had been stored longer than 90 days on site. The facility failed to submit a closure plan and Illinois EPA referred the site to U.S. EPA for enforcement action. Due to the bankruptcy and lack of assets that were no longer available to the RCRA program, the

Site was referred to the Superfund program. The State remains interested in the site to ensure its closure requirements are addressed under any proposed cleanup plan. Based on current information the local authorities have taken no action at the site.

## **2. Potential for continued State/local response**

The City of LaSalle and State authorities do not have the financial resources to pursue removal actions that may be required at the site. The State will continue to monitor any action taken at the site, and may continue to conduct inspections.

## **III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

A removal action is necessary at the LaSalle Rolling Mill to abate the threat to public health, welfare or the environment posed by the release and potential release of hazardous substances. The NCP, 40 C.F.R. 300.415(b)(2), provides eight specific criteria for evaluation of a threat and the appropriateness of a removal action. Observations documented during the Site investigation indicate that the Site meets the following criteria for a time-critical removal action:

### **a. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants**

This factor is present at the Site due to the lack of security, and the existence of numerous tanks, and over 100 drums and small containers of various chemicals and oils, located in the facility with potential exposures to potassium cyanide, acids, caustics, oxidizers and flammable liquids. State information indicates that the facility may still have as much as 30,000 to 40,000 gallons of hazardous waste (F007) on site. Evidence of past releases were observed along the west side of the property where large storage tanks are located. Remediation waste from a previous spill remains on site and is alleged to contain elevated levels of lead and cadmium. Due to the presence of cyanide compounds and acids remaining at the facility, the potential exists for the release of hydrogen cyanide gas should spills occur due to vandalism and/or fire.

**b. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release**

This factor is present at the Site due to the existence of numerous tanks and containers located throughout the facility. Hazardous substances observed include plating waste (F007), potassium cyanide solids and solutions, acids, caustics, oxidizers, oils, and flammable liquids. Although some inspections are occurring at the site, the potential for release is present due to deterioration of containers and equipment and lack of routine maintenance at the facility. Evidence of past releases are present outside in the area of the rolling oil storage tanks. The secondary containment devices for the oil and plating waste tanks all contain water and threaten the effectiveness of these devices should a tank release occur.

**c. High levels of hazardous substances or pollutants or contaminants in soils, largely at or near the surface, that may migrate**

This factor is present at the Site due to the existence of remediation waste stockpiled north of the building which allegedly contains elevated lead and cadmium. Significant soil staining was observed along the west portion of the facility in the general area of the storage tanks. Based on the facility location, past releases to the soil and potential future releases may impact the Vermillion River which is directly east of the site.

**d. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released**

This factor is present at the Site due to the existence of past releases which have impacted site soils, precipitation and/or wind may allow for the additional migration of contaminants. Due to the lack of routine maintenance at the facility, precipitation will eventually fill the secondary containment devices, releasing the residual oil observed in these units to the environment. With the secondary containment compromised, any tank failure will result in an immediate release to the environment.

**e. Threat of fire or explosion**

This factor is present at the Site due to the existence of flammable liquids and combustible materials within the facility and the fact that the fire suppression system is currently not operational.

**f. The unavailability of other appropriate federal or state response mechanisms to respond to the release**

This factor supports the actions required by this Order at the Site because State and local authorities lack the financial resources to address the threats to human health and the environment.

**IV. ENDANGERMENT DETERMINATION**

Given the current conditions at the Site and the nature of the hazardous substances on-site, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing and completing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment. The possibility of further releases of the hazardous substances present a threat to the nearby population and the environment via the exposure pathways described in Section III.

**V. PROPOSED ACTIONS**

There are obvious time-critical elements present at the Site. The hazardous substances are located in an unsecured site, with signs of public trespass, located near industrial and residential areas, and must be immediately addressed. The proposed removal actions at the Site would eliminate the imminent and substantial threats to human health, welfare, or the environment, as outlined in this memorandum.

The OSC proposes to undertake the following response actions to mitigate threats posed by the presence of hazardous substances at the Site:

1. Develop and implement a site-specific workplan including a proposed timeline;

2. Develop and implement a site-specific health and safety plan;
3. Provide site security measures which may include, but not be limited to, security guard service, fencing, and board-up services;
4. Stage, sample, and secure all site wastes and residual materials, including but not limited to, wastes and materials in or from:
  - a. All tanks, 55-gallon drums and small containers;
  - b. Pits, sumps, vats, piping, and bags;
  - c. Debris and soil;
  - d. Friable asbestos from pipe wrap and other sources that is loose or fallen to the ground.
5. Overpack and secure leaking and deteriorated drums and other containers;
6. Conduct compatibility tests on liquids, sludges, solids, and other hazardous wastes and substances;
7. Bulk and consolidate waste for off-site disposal;
8. Evaluate soils and debris, and determine appropriate methods for stabilization and/or disposal, if necessary;
9. Arrange and effect transportation and disposal of all hazardous wastes, pollutants, and contaminants at an EPA-approved disposal facility;
10. Decontaminate and/or dispose of all scrap metal and other debris, as appropriate;
11. Decontaminate as necessary, facility equipment and structures;
12. Conduct confirmation sampling, as appropriate, to ensure contaminant levels have been reduced to an acceptable level;
13. Reuse, recycling of any waste, residual materials, and equipment will require approval by U. S. EPA;



14. Verify compliance with all NESHAP requirements for asbestos related issues;
15. Verify compliance with the SPCC requirements pursuant to 40 CFR 112, due to the oil storage capacity on-site in excess of 1320 gallons.
16. Performing other actions to investigate contamination on the property that U.S. EPA may determine to be necessary;
17. Taking any response action to address any release or threatened release of a hazardous substance, pollutant, or contaminant which U.S. EPA determines may pose an imminent and substantial endangerment to the public health or the environment;

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage or disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 CFR 300.440, 58 Federal Register 49215 (Sept. 22, 1993).

The removal action will be taken in a manner not inconsistent with the NCP. The OSC has begun planning for provisions of post-removal site control, consistent with the provisions of Section 300.415(1) of the NCP. It is envisioned that after implementation of this removal action, there will be no need for post-removal site control.

All applicable and relevant and appropriate requirements ('ARARs') of federal and state law will be complied with, to the extent practicable. A federal ARAR determined to be applicable for the Site is the RCRA Off-Site Disposal Policy. A state ARAR determined to be applicable for the Site is the Subtitle G: Waste Disposal Regulations. Any additional federal and state ARARs will be addressed to the extent practicable. A letter dated August 26, 2002 was sent to Illinois EPA requesting any additional State ARARs.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the Site which may pose an imminent and substantial endangerment to public health, welfare, or the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

#### **VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

A delay or inaction at the Site may result in an increased likelihood of direct contact to human populations by the hazardous substances. Since the Site is easily accessible, the various threats to human health and/or the environment pose a serious threat to the local population. Additionally, any delay or non-action will also increase the likelihood of migration of contaminants off-site into the surrounding commercial and residential neighborhood.

#### **VII. OUTSTANDING POLICY ISSUES**

No significant policy issues are associated with the the LaSalle Rolling Mill site.

#### **VIII. ENFORCEMENT**

For Administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential addendum. (Attachment I)

## IX. RECOMMENDATION

This decision document represents the selected removal action for the LaSalle Rolling Mill site, located in LaSalle, LaSalle County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site (see Attachment III). Conditions at the Site meet the criteria of Section 300.415(b)(2) of the NCP for a removal action, and I recommend your approval of the proposed removal action. You may indicate your decision by signing below.

APPROVE: \_\_\_\_\_

*W. E. Myers*  
Director, Superfund Division

DATE: \_\_\_\_\_

*9/10/02*

DISAPPROVE: \_\_\_\_\_

Director, Superfund Division

DATE: \_\_\_\_\_

Attachments: I. Enforcement Confidential addendum  
II. Administrative Record  
III. Region 5 Superfund EJ Analysis

cc: K. Mould, U.S.EPA, OERR, 5202G

M. Chezik, U.S. Department of the Interior, w/o Enf.  
Addendum

B. Everetts, Illinois EPA, w/o Enf. Addendum

**ATTACHMENT I**

**ENFORCEMENT ADDENDUM**

**LASALLE ROLLING MILL  
LASALLE, LASALLE COUNTY, ILLINOIS**

**ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY**

**(REDACTED 1 PAGE)**

**NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION**

## ATTACHMENT II

### U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

#### ADMINISTRATIVE RECORD FOR LASALLE ROLLING MILL SITE LASALLE, LASALLE COUNTY, ILLINOIS

ORIGINAL  
JULY 16, 2002

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	10/09/98	Canterbury, M.	Illinois EPA	Narrative: October 9, 1998 Compliance Evaluation Inspection at the LaSalle Rolling Mill Site	5
2	05/07/99	Canterbury, M.	Illinois EPA	Narrative: May 7, 1999 Follow-Up Compliance Inspection at the LaSalle Rolling Mill Site	3
3	08/30/00	Benning, B., U.S. EPA	U.S. EPA	Memorandum re: August 22, 2000 Inspection at the LaSalle Rolling Mill Site	2
4	00/00/00	Benning, B., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request for a Time- Critical Removal Action at the LaSalle Rolling Mill Site ( <b>PENDING</b> )	

# Region 5 Superfund EJ Analysis

LaSalle Rolling Mill Site LaSalle, IL

